

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE APPLICATION OF MAKHPAL  
KARIBZHANOVA FOR JUDICIAL  
ASSISTANCE PURSUANT TO 28 U.S.C. §  
1782**

**Case No. 21-mc-00442  
ECF Case**

**DECLARATION OF JOHN W. MOSCOW IN SUPPORT OF THE  
OPPOSITION TO JASMIN KARIBZHANOVA'S MOTION TO INTERVENE  
AND TO QUASH SUBPOENAS AND FOR A PROTECTIVE ORDER**

**JOHN W. MOSCOW** declares under penalty of perjury the following:

1. I am an attorney licensed to practice law in the State of New York and am senior counsel in the law firm Lewis Baach Kaufmann Middlemiss PLLC ("LBKM"). LBKM is counsel to petitioner Makhpal Karibzhanova.

2. I make this declaration in support of Ms. Karibzhanova's Opposition to Jasmin Karibzhanova's motion to intervene and to quash subpoenas and for a protective order based on correspondent records I received in response to a subpoena issued under the authorization of the Court's June 15, 2021 Order. ECF No. 9.

3. On or around June 24, 2021, I caused a subpoena to be served on Citibank, N.A. ("Citibank"). ECF No. 23-5. On July 13, 2021, the bank produced financial records responsive to the subpoena.

4. The financial records produced by Citibank reflected at least twelve transfers from accounts held by Aidan to accounts held by Jasmin. The originating accounting were held at Kazkommertsbank and Halyk Savings Bank, both in Kazakhstan, and a branch of Credit Suisse in Singapore. The transfers were dated between January 2017 and March 2020. In total, the records reflected nearly \$500,000.

5. I have not issued subpoenas for the records of any of Jasmin Karibzhanova's direct financial accounts.

6. On August 31, 2021 I spoke with Patrick Bonner, Esq., counsel for Aidan Karibzhanov and Jasmin Karibzhanova. On behalf of Makhpal, I offered to enter a confidentiality order in this proceeding protecting any records evidencing Jasmin's purely personal expenditures. Mr. Bonner subsequently declined the offer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 24, 2021

A handwritten signature in blue ink, reading "John W. Moscow", is positioned above a horizontal line.

John W. Moscow